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November 27, 2013

## VIA EMAIL

Honorable Lorna G. Schofield U.S. District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Guzman v. NYP Holdings, Inc., et al.

09 CV 9323 (LGS)

## APPLICATION GRANTED.

On or before December 4, 2013, Plaintiff shall submit to Chambers an unredacted courtesy copy, which complies with the Court's Individual Rules III.B.6 and II.B.5, of all motions in limine for which Plaintiff was the moving party.

SO ORDERED.

Dated: December 2, 2013

New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

## Dear Judge Schofield:

We represent Plaintiff Sandra Guzman in the above-referenced matter and write pursuant to Rule I.C.3 of Your Honor's Rules of Individual Practice, Redactions and Filing under Seal to respectfully request the Court's permission to file one of Plaintiff's oppositions to Defendants' motions in limine under seal in its entirety. Specifically, Defendants filed a motion in limine pursuant to Fed. R. Evid. 412 ("Rule 412") seeking to introduce at trial certain irrelevant, highly prejudicial and inadmissible evidence regarding Ms. Guzman's personal life. Rule 412 anticipates that motion practice pursuant to the Rule will be conducted under seal. As such, we seek to redact Plaintiff's entire opposition to Defendants' Rule 412 motion. The opposition, which is completely highlighted to reflect our proposed filing under seal, is attached hereto as Exhibit A.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

Lawrence M. Pearson

cc: Mark W. Lerner, Esq. (via email)